

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

Case No. 1:18 Cr. 00204-NGG

FILED UNDER SEAL

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

Submitted on January 9, 2019

PLEASE TAKE NOTICE that the undersigned attorney, Marc Agnifilo, for the Defendant, KEITH RANIERE, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for an order granting the following relief pursuant to Rule 12 of the Federal Rules of Criminal Procedure:

1. To suppress items searched and seized from Raniere's Yahoo! email account; and
2. To Order a hearing regarding the Government reckless procuring of a search warrant, pursuant to Franks v. Delaware, 438 U.S. 154, 98 S. Ct. 2674 (1978).

These motions are based on this Notice of Motion, the accompanying Affirmation of Marc Agnifilo, and the accompanying Memorandum of Law in Support of Raniere's Motion. Raniere respectfully requests oral argument on this Motion.

Dated: January 9, 2019
New York, NY

Respectfully submitted,

/s/

Marc Agnifilo, Esq.
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